

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
Angelo J. Carrozza and Shannon Carrozza	:	
	:	
Debtors	:	Case No.: 14-12392

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, by and through their undersigned counsel, hereby move this Honorable Court to modify the confirmed Chapter 13 Plan and in support thereof avers as follows:

1. Angelo J. Carrozza and Shannon Carrozza, hereinafter referred to as “Debtors,” filed a petition under Chapter 13 Bankruptcy on or about March 31, 2014.
2. The subject Chapter 13 filing was assigned case number 14-12392.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about November 6, 2014.
4. On or about January 26, 2017 this Honorable Court approved a loan modification agreement between the Mortgagee and the Debtors.
5. The subject mortgage modification saves the Debtors approximately \$141.46 per month on their mortgage payments.
6. Moreover, the subject mortgage modification capitalized any outstanding pre-petition mortgage arrears into the modified principal loan balance, thereby increasing the distribution to the unsecured creditors by \$21,635.82.

7. Accordingly, per the Modified Chapter 13 Plan filed contemporaneously herewith, there shall be an increase to the unsecured creditors.

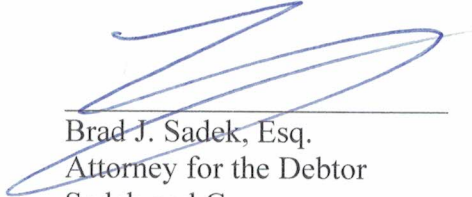
8. In accordance with the terms of the Loan Modification Agreement, the Debtor is seeking to modify the terms of his Chapter 13 Plan to discontinue the cure of the pre-petition default to his first mortgagee.

9. The Debtor Husband is self-employed and the Amended Schedule I reflects his January, 2017 income which is a lower average income month in that he is paid from work performed in December of the previous year, December is the slowest month of work for the Debtor Husband.

10. Although the Debtor Husband is self-employed and has variances in his monthly income, he is and has been able to remain current on the Chapter 13 repayment Plan.

WHEREFORE, the Debtors request that they be permitted to modify the Chapter 13 for the foregoing reasons.

Dated: February 15, 2017



Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek and Cooper
1315 Walnut Street, #502
The Philadelphia Building
Philadelphia, PA 19107
215-545-0008